

July 18, 2000

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EPA, REGION VIII
SUPERFUND BRANCH

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Ms. Andrea Madigan
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Mr. Jim Christiansen
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Re: Richardson Flat Tailings Site — Summit County, Utah (8ENF-T)

Dear Andrea and Jim:

This firm represents ASARCO Incorporated with regard to the above-referenced site. This letter is written on behalf of Asarco, ARCO and Noranda ("Companies"), all of which received letters from EPA dated on or about June 7, 2000 notifying them of EPA's view that they may have potential liability at the Richardson Flat Tailings Site. The letters invited the Companies to participate in response activities at the site through the negotiation of an Administrative Order on Consent ("AOC") for focused remedial investigation/feasibility study ("RI/FS").

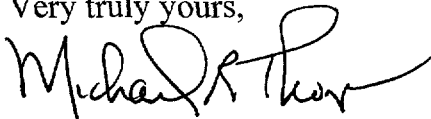
As Rich Curley explained on behalf of the Companies in a recent telephone conversation with Andrea, given EPA's and United Park City Mines Company's ("United Park") desire to begin field work this summer and United Park's central role as owner of the site in preparing the Statement of Work and Workplan for the focused RI/FS, the Companies believe that it would be in all the parties' best interests for United Park alone to conduct the focused RI/FS with EPA oversight. The Companies' decision is based, in large part, on the fact that they are not in nearly as good a position as the site's owner, United Park, to rapidly negotiate an AOC with EPA and begin to implement the focused RI/FS Workplan.

Moreover, by taking this approach, during the coming weeks and months in which EPA and United Park will presumable negotiate an AOC and begin to conduct the RI/FS, the

Companies will be able to concentrate on completing their initial evaluation of what prior involvement they may have had with the site and continue discussions which are underway between the Companies and between the Companies and United Park about how the Companies might participate in funding the focused RI/FS. We hope that both EPA and United Park agree that this division of labor will allow all of the parties involved to accomplish the maximum progress in the shortest time possible.

Please let us know if you have any questions or wish to discuss this matter further.

Very truly yours,



Michael R. Thorp
Attorney for ASARCO Incorporated

cc: Donald Robbins, Asarco
Richard Curley, Arnold & Porter
Chuck Stilwell, ARCO
Alan Au, ARCO
Rick Siwik, Noranda
Jim Schnarr, Noranda
Ed Van Ginkel, Noranda